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December 17, 2017

By ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 430
New York, New York 10007

Re: *In re Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (FM)

This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279
Estate of John P. O'Neill et. al., v. Al Baraka et. al., No. 04 Civ. 1923
World Trade Center Properties, L.L.C. et al. v. Al Baraka Investment and Development Corp., et al., No. 04 Civ. 7280

Dear Judge Netburn:

We represent defendant Yassin Abdullah Kadi in this matter. We write to request an extension of two weeks, from January 5 to January 19, 2018, of our time to respond to Plaintiffs' Motion to Compel in this matter, filed December 1. Plaintiffs' counsel has kindly consented to this request. No prior request for this relief has been made.

The reasons for this request are the length and detail of Plaintiffs' assertions of deficiencies in Mr. Kadi's production, the necessity of communicating with our overseas client and his London counsel, and the intervening holidays.

Hon. Sarah Netburn

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We thank the Court for its consideration of this request.

Respectfully,

s/

Peter C. Salerno

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)